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**From:** Hestmark, Martin  
**Sent:** Wed 9/23/2015 4:58:04 PM  
**Subject:** FW: Original list of 15 mining sites  
mining summary analysis 8 21 15 one page.docx

Although I think it is intuitive that we continue to work on the Gold King, to stabilize the mine and install associated infrastructure and the treatment plant to manage discharges associated with the mine stabilization and assessment, I thought it appropriate to get your concurrence (and ID this mine on your list) on continuation as ceasing operations poses or would pose an imminent threat to human health or a significant increase in environmental risk greater than if work halts and EPA's emergency response program needs to address or is addressing an actual or potential imminent threat to public health or the environment. Your feedback please.

DDs, per today's discussion, here are two items that seem to be of interest:

- Attached is the original list of 15 mining sites for which we raised concern about work proceeding. This list was developed on 8/21/15. You will see that for 10 sites, work was either stopped or not started, while the last five on the list we agreed with the Regions for work to continue due to the potential for increased risk, in accordance with the original Woolford/Cheatham memo of 8/14/15.

- Below is a table of the 10 sites for which work was either stopped or not started, with some additional detail and updates. Note that two of the sites have re-started: Standard Mine and Leviathan.

Please let us know if you have any questions. Thanks – Dana

Dana Stalcup

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<i>Site / Mine Name</i>	<i>State</i>	<i>Region</i>	<i>Status as of 9/15/2015</i>
<b><i>Work Stopped Pending Further Investigation</i></b>			
SW Jefferson County	Missouri	7	The Region will request support from the US Army Corps of Engineers on dam design and construction plans prior to proceeding with additional on-site work at the tailings dam. The Region will also ensure appropriate emergency and notification procedures will be in place prior to site work. Not all work has stopped. We did stop work planned on a tailings dam, but residential yard removal work continues in order to address the human health threat.
Standard Mine	Colorado	8	This mine presented some concern of hydraulic risks and potential large-scale releases. An independent engineering company conducted analysis of the Region's plan to further investigate the site-specific conditions related to the mine and acid mine drainage build-up. The plan includes drilling a parallel hole to allow for sideways sampling for hydraulic and contamination issues through the mine. The independent analysis deemed this approach to be an appropriate and cautious approach to proceeding with the assessment. The Region has also ensured appropriate emergency and notification procedures were in place prior to re-starting work. <b>Standard Mine investigation resumed on September 4, 2014 after study was conducted that showed that an appropriate measures were being carried out to continue work</b>
Leviathan Mine	California	9	<b>Some work has re-started at the site, per</b>

**discussions and agreement between Region 9 and headquarters on September 11.**

Sampling for the RI/FS will continue; this poses no hydraulic risk and should continue immediately due to the need to characterize the contamination as well as take advantage of low water levels. The beaver dam removal will not continue until additional analysis is done to identify the appropriate removal action and ensure emergency precautions are in place. The Region will also ensure appropriate emergency and notification procedures will be in place prior to site work. Ongoing AMD treatment and RI/FS work is continuing. Only the beaver dam removal is stopped for now

Iron Mountain Mine

California 9

The planned chute plug replacement was delayed until next year to allow adequate time to analyze the hydraulic risks and develop a safe and appropriate plan for the work. The Region will also ensure appropriate emergency and notification procedures will be in place prior to site work. Ongoing AMD treatment and RI/FS is continuing. Only one planned chute plug replacement is stopped for now.

*As part of the agency evaluation process, the status of a site may change*

***Field Work Initiation is on Hold***

Argonaut Mine

California 9

The integrity of the dam is in question, based on prior analyses by the US Army Corps of Engineers. Potential dam failure presents a real health and safety as well as environmental risk to the citizens of Jackson, CA, and surrounding communities. While dam retrofit plans and designs are underway and being coordinated with the State [construction hoped for 2016], additional safety measures including emergency storm water management options are being discussed due to the potential for heavy storm events brought on by the expected El Nino weather patterns. Dam retrofit design work and emergency planning efforts are underway. Discussions underway with California on

emergency storm water management options.

***Further Assessment Needed to Determine Whether Work Should be Conducted***

Flat Creek/Iron Mountain Mine	Montana	8	No mechanical activities are occurring. State has performed an EE/CA and is working on an action memo.
Upper Tenmile Creek	Montana	8	No site work is planned for this year.
Camp Bird Mine	Colorado	8	R8 On-Scene Coordinator has been conducting the assessments and no work has been initiated
James Creek Release	Colorado	8	R8 On-Scene Coordinator has been conducting the assessments and no work has been initiated
Eagle River	Colorado	8	R8 On-Scene Coordinator has been conducting the assessments and no work has been initiated